

1 District Judge James L. Robart
2 Magistrate Judge S. Kate Vaughan
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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JANE DOE,

Petitioner-Plaintiffs,

v.

DREW BOSTOCK, *et al.*,

Respondents-
Defendants.

Case No. C24-0326-JLR-SKV

STIPULATED MOTION TO EXTEND
DEADLINE AND [PROPOSED]
ORDER

Noted for Consideration:
July 26, 2024

The parties, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to extend Respondents' deadline to file a return to the habeas petition to August 28, 2024. This Court has extended this deadline once before and Respondents' current deadline to file a return is July 29, 2024. Dkt. No. 22, Order. Good cause exists for a second extension of this deadline to August 28, 2024.

A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

STIPULATED MOTION
[Case No. C24-0326-JLR-SKV] - 1

UNITED STATES ATTORNEY
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1 Since the parties' last filing, the Immigration Judge issued a final order of removal and
 2 Petitioner waived appeal. Petitioner has filed an application with U.S. Citizenship and
 3 Immigration Service ("USCIS") that may allow her to remain in the United States. She has also
 4 submitted a request to U.S. Immigration and Customs Enforcement ("ICE") for an administrative
 5 stay of her removal. ICE requires a preliminary determination from USCIS before it can decide
 6 this request. Accordingly, an extension will provide the time for the agencies to process and save
 7 resources of the parties and this Court.

8 Accordingly, the parties respectfully request that the Respondents' deadline to file a return
 9 be extended to August 28, 2024.

10 DATED this 26th day of July, 2024.

11 Respectfully submitted,

12 TESSA M. GORMAN

RIGHTS BEHIND BARS

13 TESSA M. GORMAN
 United States Attorney

s/ Oren Nimni

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21 Attorneys for Respondents-Defendants.

22 ***I certify that this memorandum contains 236
 words, in compliance with the Local Civil
 Rules.***

23 Attorneys for Petitioner-Plaintiffs

24 STIPULATED MOTION
 [Case No. C24-0326-JLR-SKV] - 2

UNITED STATES ATTORNEY
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[PROPOSED] ORDER

2 For good cause, Respondents' deadline to file a return is extended to **August 28, 2024**. It
3 is so **ORDERED**.

5 DATED this 29th day of July, 2024.

S. Kate Vaughan
S. KATE VAUGHAN
United States Magistrate Judge